

this motion is contained in the separately filed Appendix to Plaintiff's Motion to Remand, which consists of the Policy that is referenced in Plaintiff's Amended Petition.

WHEREFORE, Plaintiff Vandelay Hospitality Group LLC d/b/a Hudson House respectfully requests that this Court to deny Defendant Cincinnati's Motion to Dismiss in its entirety. Alternatively, if the Court believes the Motion should be granted in whole or in part, Plaintiff requests leave of court to amend its Complaint. Plaintiff further requests this Court grant any other relief to which it may be justly entitled, in law or in equity.

DATED: July 3, 2020

Respectfully submitted,
FRIEDMAN & FEIGER, L.L.P.

/s/ Shauna A. Izadi

SHAUNA A. IZADI

State Bar No. 24041170

Email: sizadi@fflawoffice.com

JASON H. FRIEDMAN

State Bar No. 24059784

Email: jason@fflawoffice.com

5301 Spring Valley Road, Suite 200

Dallas, Texas 75254

(972) 788-1400 (Telephone)

(972) 788-2667 (Telecopier)

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on July 3, 2020 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties who have appeared and registered with CM/ECF.

/s/ Shauna A. Izadi
Shauna A. Izadi